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**Via ECF**

The Honorable Sarah Netburn  
 Judge, United States District Court  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, NY 10007

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May 1, 2017

**In re Terrorist Attacks of September 11, 2001, 03 MDL 1570**

Dear Judge Netburn,


We write to you on behalf of Dubai Islamic Bank in response to the Court's April 21, 2017 order regarding the proposed deposition(s) of Dr. Hussein Hamid Hassan ("Dr. Hussein"). The Plaintiffs' Executive Committees have reviewed this letter and concur in its contents.

Pursuant to the Court's April 21 order, the Plaintiffs' Executive Committee and counsel for Dubai Islamic Bank have met and conferred regarding a proposed deposition protocol for Dr. Hussein. Due to Ramadan and Eid (followed by the July Fourth holiday), the parties have agreed to schedule Dr. Hussein's deposition(s) in mid-July or shortly thereafter. Plaintiffs have agreed to send shortly their availability for a deposition or depositions in July and August. The parties will then confer in an effort to set a mutually agreeable schedule during this timeframe.

Given the revised timeframe of Dr. Hussein's deposition(s), the parties have agreed to attempt to draft a comprehensive deposition protocol that will apply to all witnesses in the Multidistrict Litigation, including the deposition(s) of Dr. Hussein. As the Court recognized during the hearing of April 21, 2017, finalizing a comprehensive deposition protocol may require input and rulings from the Court, but the parties agree that the best course is to try to finalize

The Court appreciates the parties' willingness to work collaboratively to craft a comprehensive deposition protocol before proceeding with Dr. Hussein's deposition. Accordingly, the Plaintiffs' Executive Committees ("PEC") and Defendants' Executive Committee ("DEC") are ordered to meet and confer and submit a proposed deposition protocol by Monday, May 29, 2017, accompanied by separate letters identifying any areas of dispute that they would like to bring to the Court's attention. Because Dr. Hussein's deposition will be the first to be subjected to this prospective protocol, if Dubai Islamic Bank has any comments or objections to the protocol that are particular to this deposition, it may file a separate letter on this date as well.

**SO ORDERED.**

  
 SARAH NETBURN  
 United States Magistrate Judge

May 1, 2017  
 New York, New York